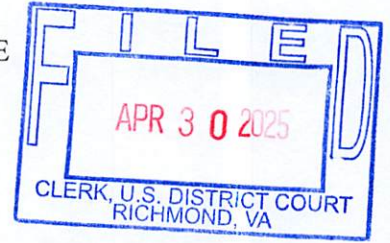


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division



UNITED STATES OF AMERICA, )

v. )

ALEJANDRO PEREZ GARFIAS, )

Defendant. )

Criminal No. 3:25-mj- 44

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Nelson Villarroel, being duly sworn, state the following:

1. I am a Deportation Officer (DO) with the Richmond, Virginia office of the Department of Homeland Security (DHS) Immigration and Customs Enforcement (ICE). I have been employed as a Deportation Officer since November 2016. Prior to being a Deportation Officer, I was a U.S. Border Patrol Agent.

2. This affidavit is in support of a criminal complaint charging Alejandro PEREZ GARFIAS with Reentry After Deportation, in violation of 8 U.S.C. § 1326(a). As described herein, PEREZ GARFIAS is a citizen of Mexico, who was previously removed from the United States, reentered the United States, and was found in the United States within the Eastern District of Virginia without having first obtained the express consent of the Attorney General or his successor, the Secretary of Homeland Security.

3. The facts and information contained in this affidavit are based on my personal knowledge and observations, information conveyed to me by other law enforcement officials, and my review of records, documents, and other physical evidence obtained during this investigation. This affidavit contains information necessary to

support probable cause but is not intended to include all the facts and matters observed by me or known to the government.

4. Alejandro PEREZ GARFIAS was born in Mexico, and at all times has been a citizen of Mexico.

5. On April 17, 2009, PEREZ GARFIAS was apprehended by Border Patrol Agents near Douglas, Arizona, and on the same date was granted a Voluntary Return to Mexico.

6. At an unknown date and time, PEREZ GARFIAS reentered the United States.

7. On March 28, 2013, PEREZ GARFIAS was convicted of DUI, in the Circuit Court of Kenosha County, Wisconsin.

8. On January 17, 2014, PEREZ GARFIAS was convicted of misdemeanor Attempted Possession of a Controlled Substance, Cocaine, in the Circuit Court of Lake County, Illinois.

9. On May 20, 2016, PEREZ GARFIAS was convicted of misdemeanor Larceny in the Circuit Court of Lake County, Illinois.

10. On May 25, 2016, PEREZ GARFIAS came into ICE custody after a detainer was lodged at Lake County Jail, Illinois, where PEREZ GARFIAS was incarcerated. PEREZ GARFIAS' case was then processed as a Notice to Appear, and he was assigned Alien Registration Number A208 962 842.

11. On September 13, 2016, an Immigration Judge in Chicago, Illinois, ordered PEREZ GARFIAS removed to Mexico.

12. On October 10, 2016, PEREZ GARFIAS was removed to Mexico via ICE-Air Operations.

13. At an unknown date and time between October 10, 2016, and June 6, 2017, PEREZ GARFIAS reentered the United States without the permission of the Attorney General or the Secretary of the Department of Homeland Security.

14. On June 6, 2017, PEREZ GARFIAS was encountered by ICE-Fugitive Operations. PEREZ GARFIAS had a pending arrest warrant from Waukegan County, Illinois. PEREZ GARFIAS was placed in ICE custody and served with an I-871 Notice of Intent/Decision to Reinstate Prior Order of Removal.

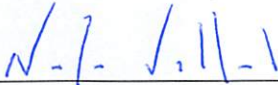
15. On June 16, 2017, PEREZ GARFIAS was removed to Mexico through the Hidalgo Port of Entry in Hidalgo, Texas.

16. At an unknown date and time between June 16, 2017, and April 19, 2025, PEREZ GARFIAS reentered the United States without the permission of the Attorney General or the Secretary of the Department of Homeland Security.

17. On April 19, 2025, PEREZ GARFIAS was encountered by ICE-CAP officers at Henrico County Jail, Virginia, pending DWI charges. PEREZ GARFIAS was served with an I-871 Notice of Intent/Decision to Reinstate Prior Order of Removal.


18. Based on the facts and information set forth above, I respectfully attest that there is probable cause to believe that PEREZ GARFIAS illegally reentered the United States after having been deported, in violation of Title 8, United States Code, Section 1326(a).

Respectfully submitted,

  
\_\_\_\_\_  
Nelson Villarroel  
Deportation Officer  
United States Immigration & Customs Enforcement

Reviewed and approved by AUSA Shea Gibbons

Sworn to and subscribed before me <sup>APRIL</sup> May <sup>30</sup>, 2025.

  
\_\_\_\_\_  
Honorable Mark R. Colombell  
United States Magistrate Judge  
Richmond, Virginia